

February 15, 2000

**TO:** Gas Distribution Operators

**FROM:** Glynn Blanton, Chief  
Gas Pipeline Safety Division (GPSD)

**SUBJECT:** Pipeline Safety Informational Mailing (2000-01)

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Certified Laboratory list  
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**DOT Updates**

- Research and Special Programs  
Administration (RSPA) issued a final rule concerning the qualification of pipeline personnel. This Operator Qualification Rule (OQ Rule) requires all natural gas and hazardous liquid pipeline operators to develop and maintain a written qualification program for individuals performing covered tasks on pipeline facilities. The objective of this OQ Rule is to help ensure a qualified work-force and to reduce the probability and consequence of incidents caused by human error. This rule creates new subparts in the gas and hazardous liquid pipeline safety regulations.

Operators have until April 27, 2001 to develop a written qualification program. Operators have until October 28, 2002 to complete the qualification of all individuals performing covered tasks. For those employees who performed covered tasks on a regular basis prior to August 27, 1999, documentation of past experience, on-the-job training and industry-related training can be used for initial evaluation and qualification.

*Happy New Year*

**NOTE: Master meter operators are not exempt from this rule.**

Several organizations (Southern Gas Association, Tennessee Gas Association, American Public Gas Association, etc.) have developed model written plans and training programs. Operators are encouraged to contact these organizations for help in complying with the OQ Rule.

- Federal and State regulatory agencies, along with others in the industry, are taking the initiative to clarify the definition of a “gas gathering line” as used in 49 CFR, Part 192. A joint study group, the Gas Gathering Coalition, has been established to rewrite the regulation. Anyone wishing to participate should send their comments or suggestions to the Office of Pipeline Safety, 400 Seventh St., Room 7128, Washington, DC 20590, attention L.E. Herrick.
- Section 192.459 of the Minimum Federal Safety Standard (MFSS) was amended on October 22, 1999. This section of the code now requires specific action to be taken when buried pipelines are exposed. If external corrosion requiring remedial action is found, the operator must now investigate circumferentially and longitudinally beyond the exposed portion to determine whether additional corrosion exists in the vicinity of the exposed portion. The amended rule became effective November 22, 1999.
- The Research and Special Programs Administration (RSPA) has announced that the minimum random drug testing rate for the pipeline industry will remain at 25% of the covered employees for the year 2000. Also, each operator with 50 or more covered employees is reminded that the MIS drug and alcohol reports are due in Washington not later than **March 15, 2000**.
- The current list of certified drug labs is enclosed in this informational mailing. Be sure that the laboratory utilized by the consortium or your organization is among those listed.

### **Annual Report Forms**

The Annual Report forms (F7100.1-1) are due back to the Information Systems Manager in Washington by **March 15, 2000**. A copy of same should be sent to our office by **April 1, 2000**. If you have not sent your copy, please do so as soon as possible. Late reports can be subject to possible civil penalties. If you need assistance with this form, or if you failed to receive your copy, please let us know and we will be glad to help you.

### **Damage Prevention Activities**

- The Tennessee Underground Damage Prevention law was modified during the past legislative session. The current law basically takes enforcement out of the state Attorney General’s office and places it under the jurisdiction of local law enforcement agencies. There are several changes to the law regarding response times and other items that everyone should become familiar with. Please contact Tennessee One-Call for a copy of the new law.

- We would also like to encourage your participation in completing the damage report form available from Tennessee One-Call. This information is being collected to provide statistical data on the number of hits or damages occurring on all underground facilities.

Damage reports can be filed electronically by visiting ([www.tnonecall.com](http://www.tnonecall.com)) or faxing the information to Tennessee One-Call.

- The GPSD has made an application with RSPA for funding via the One Call grant program. This grant will be used by our agency to increase awareness of the Tennessee Underground Damage Prevention law to local law enforcement agencies and ultimately help reduce the number of damages to all underground facilities. Information on scheduled meetings with local law enforcement agencies in your areas will be available after the federal government has approved the grant application. We welcome your participation, suggestions or comments regarding dates and locations for these meetings.
- The Damage Prevention Quality Action Team (DAMQAT) is a joint government and industry team that has developed a national campaign slogan, (Call before you dig; Wait the required amount of time; Respect the marks; and Dig with care.) and logo (“**Dig Safely**”) on educating the public to prevent damages to all underground facilities. The team has released a report on their findings and developed a campaign program for U.S. Secretary of Transportation Rodney Slater. The team members, who include a representative from our office, are assisting in the implementation of the national “**Dig Safely**” damage prevention education campaign. “**Dig Safely**” brochures, posters, bill inserts and other items are available to all utility companies and organizations free of charge to help educate the public in preventing damages to utilities. The “**Dig Safely**” information is available at [www.cyclac.com/opsiswc/](http://www.cyclac.com/opsiswc/).
- We are encouraging all utility companies to join in this effort to better educate the public and spread the word by publicizing this free information in your news letters, trade magazines or other publications. “**Dig Safely**” manuals that can assist you with implementation of this program may be obtained by contacting one of the DAMQAT members, Bill Turner or Kathy Quartermaine with Tennessee One-Call System.

### **Federal Inspection**

Once again, the Southern Region Office of Pipeline Safety (OPS) conducted its annual review of Tennessee’s Gas Pipeline Safety Program. We are proud to announce that the TRA received a score of 99 out of a possible 100. The TRA retains its Natural Gas Pipeline Safety certification with OPS by agreeing to carry out a program to enforce the standards contained in Parts 191-193, 199 and 40 of the Code of Federal Regulations.

## **Inspection Fees**

All operators are reminded that your active gas meter and services form along with your inspection fees are due to the TRA **no later than April 1, 2000**. In accordance with TCA 65-4-308, any utility in default shall be liable to a penalty of ten percent (10%) per month or a fraction thereof on the amount of the fee. Each operator is responsible for ensuring that this information is accurately filed with the TRA.

## **Updating Manuals**

Please review and update your Operation and Maintenance (O&M) Manuals and Emergency Plans. These plans and procedures are required to be reviewed/updated once each calendar year, not to exceed 15 months (192.605(a)). Names and telephone numbers should be reviewed and updated. Below are the names and telephone numbers for the Gas Pipeline Safety Division, as well as the Response Center in Washington D.C.

**Gas Pipeline Safety Office:** (615) 741-2844 ext. 184 or (800) 342-8359 ext. 184

<u>Name</u>	<u>Extension</u>	<u>Home Number</u>	<u>E-Mail</u>
Glynn Blanton	185	(615) 370-1125	gblanton@mail.state.tn.us
Earnest Burke	182	(615) 395-4655	eburke@mail.state.tn.us
Tom Woosley	181	(615) 230-7557	twoosley@mail.state.tn.us
Milton Henderson, Jr.	187	(615) 793-2350	mhenderson@mail.state.tn.us
Brad Williams	186	(615) 383-6394	bwilliams@mail.state.tn.us

**Washington DC Response Center: (800) 424-8802**

## **Incident Reporting**

As part of our 5(a) agreement with OPS, we are required to ensure that all rules and regulations of the Minimum Federal Safety Standards (MFSS) are being enforced. You are asked to notify our office within **TWO HOURS** after discovery of all reportable incidents that occur on your system. A reportable incident is one which includes property damage of \$50,000 or more and meets the requirements of Section 191.3 of the MFSS. Reportable incidents must also be reported to the U. S. Department of Transportation (DOT). It is the operator's responsibility for filing the appropriate incident reports with both offices. Failure to report incidents to DOT within the two hour time frame will result in a civil penalty of \$5000. All operators are reminded to use the above listed phone numbers to report incidents during or after our normal business hours (7:30 a.m. - 4:00 p.m. CST).

## **Notification of Construction**

Prior to beginning any construction of a pipeline 3 inches or larger and 2500 feet in length or equivalent, you are requested to notify the TRA in writing, furnishing the following information:

- ◆ Location of construction
- ◆ Estimated dates of start and completion of construction
- ◆ Length and size of pipeline
- ◆ Type of pipe being installed

## **Most Cited Violations for 1999**

The following are areas found to be most deficient during our 1999 inspections:

- 192.463(a) - requires operators to provide a level of cathodic protection to the system that complies with one or more criteria chosen by the operator from Appendix D.
- 192.465(a)&(d) - (a) requires each operator to test the cathodic protection on the system once a calendar year not to exceed 15 months. This test should be conducted by an individual qualified in

pipeline corrosion control methods. - (d) requires each operator to take prompt remedial action to correct any deficiencies found while monitoring the system.

- 192.13(c) - requires each operator to maintain, modify, and follow their written Operation and Maintenance procedures.
- 192.625(f) - requires the operator to periodically sample the gas to assure that the odorant can be detected at or below one-fifth the lower explosive limit (LEL). An electronic device is necessary to fulfill this requirement.
- 192.747 - requires the operator to service and check all critical valves once each calendar year not to exceed 15 months.
- 192.605 - requires each operator to address specific operating and maintenance functions in their operation and maintenance manual (O&M).
- 192.723 - requires that a leakage survey be conducted in business districts once each calendar year, with intervals not exceeding 15 months. Outside business districts, the survey must be performed at intervals not exceeding five years.

### **TRA Website**

If you have any suggestions or requests for what we should include on the web, please let us know.

Also, if you have any comments or suggestions on improving our natural gas pipeline safety program or questions pertaining to pipeline safety regulations, we would like to hear from you. Please call us at 1-800-342-8359, extension 184, Monday through Friday, 7:30 a.m. to 4:00 p.m. CST or e-mail our staff directly. Information and activities of the TRA can be obtained by visiting our website at [WWW.STATE.TN.US/TRA](http://WWW.STATE.TN.US/TRA) .